



**SIMMONS HANLY CONROY**  
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January 5, 2024

**VIA ELECTRONIC MAIL**

Honorable Rukhsanah L. Singh, U.S. Magistrate Judge  
United State District Court of New Jersey  
Clarkson S. Fisher Building & U.S. Courthouse  
402 East State Street, Courtroom 7W  
Trenton, New Jersey 08608

**Re: In re: Johnson & Johnson Talcum Powder Products – MDL 2738**

Dear Magistrate Judge Singh,

We write in response to defendants December 14, 2023, letter regarding the Plaintiff Profile forms of Sharon Brown, Cardell Bullock, Crystal Rosensteel and Carol Yandell (#332-335).

Due to the passage of time (nearly seven years since the filing of their complaints) and the fact that all plaintiffs in this litigation have cancer, all four of the injured plaintiffs died during the pendency of their action. Nearly two years lapsed due to J&J's two unsuccessful bankruptcy filings. Since their death, Simmons Hanly Conroy has worked diligently to acquire the necessary information for the Plaintiff Profile Forms by sending numerous emails, letters, and phone calls to presumed next of kin. In addition to the difficulty of locating next of kin, the next of kin needs to have estate paperwork completed to have the authority to sign the requested documents.

Due to these issues, I have communicated with counsel for Johnson & Johnson who has agreed to extend our deadline in these cases for thirty days from the date of this letter.

We stand ready to answer any questions the Court may have. Additionally, I will attend the telephonic conference on January 10 on behalf of Simmons Hanly Conroy.

Respectfully submitted,

Dennis M. Geier

*We stand for our clients.*

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